



**DEPARTMENT OF DEFENSE**  
**REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9**  
937 N. Harbor Drive, Box 81  
San Diego, California 92132-0058

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October 22, 2013

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: AMENDMENTS TO THE CALIFORNIA CAP ON GREENHOUSE GAS  
EMISSIONS AND MARKET BASED COMPLIANCE MECHANISMS

On behalf of the Department of Defense (DOD) Regional Environmental Coordinator for EPA Region 9, and the Military Services in California, I am writing in support of your staff's recommendation on amendments to the Cap and Trade Program. Specifically, we support the modification to Section 95852.2(c) to remove the current exemption sunset date for military facilities.

Your staff recognizes that military facilities have mechanisms in place, anchored in federal mandates, which should achieve equivalent reductions through a broad-based approach encompassing sources below applicability thresholds for both the Mandatory Reporting Regulation and Cap and Trade Program. Most important, the proposed amendments will ensure we have the flexibility to meet our national security mission.

The military and ARB share many common goals and we look forward to our continued partnership on GHG reductions, renewable energy development and biofuels. We thank your staff for working with us on the issues raised by the Cap and Trade Program and ask your approval of the recommendation.

My points of contact for this are Randal Friedman who can be reached at [randal.friedman@navy.mil](mailto:randal.friedman@navy.mil) or (916) 930-5605, and Ned McKinley who can be reached at [ned.mckinley@usmc.mil](mailto:ned.mckinley@usmc.mil) or (916) 930-5606.

Sincerely,

C. L. STATHOS  
By direction